

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION – Detroit

In re:

CITY OF DETROIT, MICHIGAN

Debtor.

Chapter 9

Case No. 13-53846

Hon. Steven W. Rhodes

**EX-PARTE MOTION FOR EXPEDITED HEARING ON
GET BACK UP, INC.'S MOTION FOR
RELIEF FROM THE AUTOMATIC STAY AND FOR
WAIVER OF PROVISIONS OF FED.R.BANKR.P. 4001 (a)(3)**

Get Back Up, Inc. (“GBU”) in support of its Ex-Parte Motion for Expedited Hearing on GBU’s Motion for Relief from the Automatic Stay and for Waiver of Provisions of Fed. R. Bankr. P. 4001 (a)(3) states as follows:

1. On October 22, 2013, GBU filed its Motion for Relief from the Automatic Stay and for Waiver of Provisions of Fed. R. Bankr. P. 4001 (a)(3) (Docket No. 1314).
2. That Motion requires an expedited hearing because there is a pending motion to be resolved in the case before Judge Robert Cleland in the U.S. District Court.
3. For the reasons set forth in the motion for relief from the automatic stay, Movant believes that relief from stay is necessary as soon as possible.

WHEREFORE, GBU respectfully requests this Honorable Court grant its Ex-Parte Motion for Expedited Hearing on GBU’s Motion for Relief from the Automatic Stay and for Waiver of Provisions of Fed. R. Bankr. P. 4001 (a)(3) as more fully set forth in the proposed order attached hereto as **Exhibit A**.

Respectfully submitted,

By: /s/ Jonathan B. Frank

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Dated: October 22, 2013